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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,	)	No. 3:22-cr-00084-SI
	)	
Plaintiff,	)	MOTION FOR LEAVE TO FILE <i>EX</i>
	)	<i>PORTE</i> AND UNDER SEAL
	)	
vs.	)	
	)	
TONY KLEIN	)	
	)	
Defendant.	)	

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Defendant Tony Klein, by and through his attorneys Matthew McHenry and Amanda Alvarez Thibeault, respectfully moves the Court for leave to file a Declaration of Counsel in Support of Motion to Continue, *ex parte* and under seal. Said declaration will contain confidential and privileged defense material that cannot be set forth in a public filing.

Respectfully Submitted this 7th day of March, 2023:

/s/ Matthew G. McHenry

Matthew G. McHenry  
Counsel for Tony Klein

/s/ Amanda Alvarez Thibeault

Amanda Alvarez Thibeault  
Counsel for Tony Klein

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,	)	No. 3:22-cr-00084-SI
	)	
Plaintiff,	)	ORDER GRANTING MOTION FOR
	)	LEAVE TO FILE <i>EX PARTE</i> AND
vs.	)	UNDER SEAL
	)	
TONY KLEIN	)	
	)	
Defendant.	)	

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The Court, having reviewed the Defendant's Motion to Continue Trial and supporting Declaration of Counsel, and Defendant's Motion for Leave to File Ex Parte and Under Seal,

ORDERS that Defendant may file an additional supporting declaration *ex parte* and under seal.

GRANTED this \_\_\_\_\_ day of March, 2023.

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Honorable Michael H. Simon  
United States District Court Judge